IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 6:14CR63
	§	
JEREMY CHAD TIDWELL	§	

FACTUAL BASIS

Investigation by the Drug Enforcement Administration disclosed the following facts that establish that I, the defendant, **Jeremy Chad Tidwell**, committed the conduct described in Count 1 of the information, which charges a violation of 18 U.S.C. § 371, conspiracy to commit offenses against the United States government, and that I accept as true and correct:

1. From in or before 2012 through December 3, 2014, I conspired with Shanna Peek Tidwell and others to commit offenses against the United States, specifically 21 U.S.C. § § 813 and 841, distribution and possession with intent to distribute synthetic drugs which contained Schedule I controlled substances and controlled substance analogues, and 21 U.S.C. § 331(c), the receipt in interstate commerce of misbranded drugs and the delivery of such drugs for pay. Aspects of the misbranded drugs include that their labeling was false, and their packages did not bear the names and places of business of the manufacturers. Many of the misbranded drugs were received in interstate commerce and were then delivered or proffered for delivery for pay. The drugs were sold from our three "Glass Dragon" retail stores located in Longview, Texas, and in Gregg County, Texas, in

the Eastern District of Texas. Shanna Peek Tidwell and I were co-owners of these stores and maintained them primarily for the purpose of selling synthetic drugs. I was the President of the Tidwell Corporation and was actively involved in the day-to-day operations of the retail stores. Shanna Peek Tidwell primarily ordered and paid for the misbranded synthetic drugs. We both deposited cash proceeds into checking accounts.

2. Knowing that the synthetic drugs we sold were misbranded, we fictitiously marketed the synthetic drugs as "pot pourri," "aromatherapy," and other similarly named products to give the appearance that our products were legal.

3. The synthetic drugs we sold contained Schedule I controlled substances or controlled substance analogues. Despite their labeling to the contrary, we knew that the synthetic drugs we sold were intended for human consumption and were smoked by our customers, that they were designed to create a state of euphoria or make people high, and that the products contained chemicals. Some of our employees tested samples of the synthetic drugs to see if the products made them high. We sold the synthetic drugs which were effective in making people high.

4. In June, 2014, we moved the sale of the synthetic/misbranded drugs to a store we named "The Longview Candle Store." The primary inventory of this store was synthetic/misbranded drugs. The name of the store and the sale of a few candles were an attempt to give an illusion of legality to the illegal drugs we sold. In March, 2014, after our employees received citations at our stores in the City of Longview, we temporarily ceased selling synthetic/misbranded drugs in Longview and only sold them in Gregg County. However, in or about September, 2014, we resumed selling synthetic drugs at

one of the Longview stores, but sold them clandestinely by keeping them behind the sales counter. As a result of the citations, we requested our suppliers to change our products' packaging from terms such as "DOA," "Fear and Loathing," and "Black Voodoo" to more innocuous sounding names such as "Black Orchid" and "Summer Rain." Additionally, we instructed our employees how to conduct sales of the synthetic/misbranded drugs to make it appear that they were legal and were not to be smoked, when in fact their primary purpose was for smoking.

5. I have had an opportunity to consult with an attorney, and I am satisfied with the advice and counsel that he has provided me.

I acknowledge that I violated 18 U.S.C. § 371.

I hereby stipulate that the facts described above are true and correct and accept them as the uncontested facts of this case.

JEREMY CHAD TIDWELL
Defendant

GREG WALDRON
Attorney for Defendant